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Attorneys for Defendant
Early Warning Services, LLC

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA

LORITA L. HINES,

Plaintiff,

vs.

CATALYST CORPORATE FEDERAL
CREDIT UNION; EARLY WARNING
SERVICES, LLC; and WELLS FARGO
BANK, NA,

Defendants.

Case No. 2:20-CV-00733-RFB-DJA

**STIPULATION AND [PROPOSED]
ORDER TO EXTEND TIME FOR
DEFENDANT EARLY WARNING
SERVICES, LLC TO RESPOND TO
COMPLAINT
(First Request)**

Defendant Early Warning Services, LLC (“EWS”) and Plaintiff Lorita L. Hines (“Plaintiff”), by counsel, and pursuant to LR IA 6-1, submit the following Stipulation to Extend Time for Defendant Early Warning Services, LLC to Respond to Complaint, up to an including July 20, 2020. In support of the Stipulation, the parties state the following:

1. EWS signed a waiver of service on or around April 28, 2020 making its responsive pleading due on or around June 29, 2020.

2. The undersigned counsel for EWS was retained by EWS in connection with this matter and is continuing to review the allegations asserted in the Complaint.

3. Counsel for Plaintiff has agreed to the requested extension and the requested extension will not impact any other deadlines in this case.

4. This is the first request to extend the deadline for EWS to file its responsive pleading.

5. This request for an extension of time is not intended to cause any undue delay or prejudice to any party.

6. Therefore, the parties hereby stipulate that the deadline for EWS to file its responsive pleading shall be extended through July 20, 2020

DATED: June 25, 2020

KNEPPER & CLARK LLC

TROUTMAN SANDERS LLP

By: /s/ Miles N. Clark

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Lorita L. Hines

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ORDER

IT IS SO ORDERED.


UNITED STATES MAGISTRATE JUDGE

DATED: June 26, 2020